

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

| | | |
|---------------------|---|------------------------|
| LIVINGSCAPES, LLC | } | Case No. 3:20-bk-03561 |
| 3941 STEWARTS LANE | } | |
| NASHVILLE, TN 37218 | } | Chapter 11 |
| | } | |
| | } | Judge Harrison |

Debtor

EXPEDITED MOTION TO EXTEND DEADLINE TO CONFIRM PLAN

Comes the Debtor, through counsel, and moves this Honorable Court to extend the deadline to confirm the Chapter 11 Plan pursuant to 1129(e) of the Code. In support, the following shall be shown unto the Court:

1) ***RELIEF REQUESTED*** - The Debtor requests that the deadline to confirm a plan be extended to January 18, 2022. There are pending claim objections by the Debtor as to the contingent, unliquidated and disputed claims of Milessa Thomas and Cassie Burton. The above-referenced creditors have filed respective objections to confirmation and submitted rejection ballots to the Debtor. In light of these developments, the Debtor has conferred with bankruptcy counsel for Milessa Thomas and Cassie Burton as well as the Chapter 7 Trustee who has filed a conditional objection and the United States Trustee's office and there is no opposition to continue the confirmation hearings to January 4, 2022 to allow time to liquidate the claims prior to a confirmation hearing.

2) ***REASONS FOR URGENCY*** - The Debtor filed a plan and disclosure on August 20, 2021, and pursuant to 1129(e) has 45 days to confirm a Chapter 11 plan.

3) ***PARTIES RECEIVING NOTICE*** - Notice of this Motion will be sent to the, Assistant United States Trustee, and all parties of record to receive notice electronically via the U.S. Bankruptcy Court's CM/ECF filing system, on September 23, 2021. Notice of this Motion will be sent to the Debtor, and all other creditors and parties-in-interest, in

pursuant to the attached mailing matrix, by U.S. Mail, postage prepaid, on September 23, 2021.

4) ***PROPOSED HEARING DATE*** - The Debtor requests this matter be heard on the next available docket.

WHEREFORE, the Debtor prays for the entry of an Order granting the above-sought relief and for expedited relief thereon.

Respectfully Submitted,

/s/ STEVEN L. LEFKOVITZ
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CERTIFICATE OF SERVICE

I hereby certify that I have sent a true and exact copy of the foregoing to the Assistant United States Trustee; and all other parties of record to receive notice electronically via the United States Bankruptcy Court's CM/ECF system, on September 23, 2021

I further certify that I have sent a true and exact copy of the foregoing to the Debtor and all other creditors and parties-in-interest pursuant to the attached mailing matrix, by U.S. Mail, postage prepaid, on September 23, 2021.

/S/ STEVEN L. LEFKOVITZ
Steven L. Lefkovitz